

REMARKS

In the Office Action dated October 17, 2003, the title was objected to; claims 1-7 and 9-34 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,055,236 (Nesbett); and claim 8 was rejected under § 103 over Nesbett in view of Maughan, entitled "Internet Security Association and Key Management Protocol (ISAKMP)," dated November 1998 (hereinafter "Maughan").

The title has been amended to address the objection.

Each of the independent claims have been amended to recite that security information of a data unit includes Internet Security Association and Key Management Protocol (ISAKMP) information.<sup>1</sup>

Claim 1 is not disclosed by Nesbett, since Nesbett fails to disclose the following combination of acts: (1) receiving a data unit including ISAKMP information, and (2) translating the address information (in the data unit) to an address of a target network entity based on the ISAKMP information.

As conceded by the Office Action, Nesbett does not disclose translating address information to an address of a target network entity based on ISAKMP information.

10/17/2003 Office Action at 15. Therefore, claim 1 is clearly not anticipated by Nesbett.

However, in the obviousness rejection of prior dependent claim 8, the Office Action asserted that Maughan provides the suggestion to modify Nesbett to achieve the claimed subject matter of prior claim 8. Applicant respectfully submits that Maughan does not teach or suggest a modification of Nesbett to achieve the translating of address information in a received data unit to an address of a target network entity based on ISAKMP information. Nesbett itself describes using ISAKMP to perform security association negotiation. However, even though Nesbett recognizes the existence of ISAKMP, Nesbett does not provide any teaching that address translation can be based on ISAKMP information carried in a data packet. This is a significant indication that Nesbett does not provide any suggestion or motivation to modify its teachings to perform address translation based on ISAKMP information.

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<sup>1</sup> Applicant reserves the right to pursue the un-amended claims in a continuation application.

Although Maughan describes the ISAKMP protocol, it does not provide any suggestion that address translation can be based on ISAKMP information. Therefore, there is no motivation or suggestion to combine the teachings of Nessett and Maughan to achieve the subject matter of claim 1.

For at least this reason, a *prima facie* case of obviousness has not been established with respect to claim 1.

Furthermore, as conceded by the Office Action, Nessett does not teach or suggest translating address information (in a data unit) to an address of a target network entity based on ISAKMP information. Maughan also does not teach or suggest this feature. Therefore, even if they can be properly combined, the hypothetical combination of Nessett and Maughan fails to teach or suggest at least one element of claim 1. For this additional reason, a *prima facie* case of obviousness has not been established with respect to claim 1.

The other claims are similarly allowable over Nessett and Maughan. Independent claim 11 recites a router having a translator to generate an identifier of a network entity that the data unit is targeted for based on ISAKMP information. Independent claim 20 recites determining an address of a network entity based on ISAKMP information in a received data unit. Independent claim 26 recites converting destination address of a data unit to a network entity address based on ISAKMP information and address in one or more translation tables. Independent claim 27 recites a storage medium containing a data unit that contains ISAKMP information useable by a system to match a first destination address to a second destination address based on the ISAKMP information. Independent claim 28 recites a network address translator to convert a destination address in a received data unit to an address of one or more entities based on ISAKMP information in the received data unit.

All dependent claims are allowable for at least the same reasons as corresponding independent claims. Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees, including extension of time fees, and/or credit any overpayment to Deposit Account No. 20-1504 (NRB.0007US).

Respectfully submitted,



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